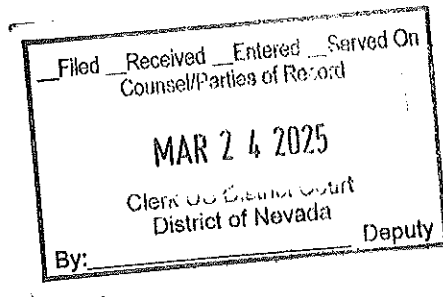


**EXHIBIT 11**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**DREW J. RIBAR, Pro Se Plaintiff**  
3480 Pershing Ln  
Washoe Valley, NV 89704  
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vs.

**WASHOE COUNTY, et al.**

Defendants.

**Case No.: 3:24-cv-00526-ART-CLB**

**EXHIBIT 11**

**Title:** Internal Meeting Notes from RainbowFest and Drag Queen Story Hour (DQSH) Volunteer  
Planning Meeting

**Date:** April 26, 2023

**Source:** Internal meeting notes from Washoe County Library System (WCLS) and Build Our  
Center, Inc. (BOC) planning session

**Bates Number Range:** EXH062 - EXH063

PLEADING TITLE - 1

1 **DESCRIPTION:**

2  
3 This exhibit contains **internal meeting notes** from a planning meeting held at **Our Center**  
4 between **Washoe County Library System (WCLS)** officials and **Build Our Center, Inc.**  
5 **(BOC)** representatives, including:  
6

- 7
- 8 • **Pam Larsen** (WCLS Representative)
  - 9 • **Tyna Sloan** (WCLS Representative)
  - 10 • **Lori Talarico** (WCLS Representative)
  - 11 • **Stacey Spain** (BOC Representative & Programs Manager)
  - 12 • **Kelly Tanguay** (BOC Representative)
- 13

14 The meeting included discussions on:

- 15
- 16 1. **Event security planning** with Black Rock Rangers and Burning Man staff to manage  
17 public safety and crowd control at **RainbowFest** and **DQSH** events.
  - 18 2. **Volunteer recruitment strategies**, prioritizing **Our Center** volunteers, **Pride**  
19 **volunteers**, and **public volunteer solicitation**.
  - 20 3. **Event organization logistics**, including booth assignments, set-up teams, and oversight  
21 roles for multiple activities (**Makeover Booth**, **Drag King/Queen Photo Op Booth**,  
22 **etc.**).
  - 23 4. **Coordination of book selections** between Drag Queen Story Hour presenters and  
24 **WCLS branches** to ensure library books aligned with the event themes.  
25  
26  
27  
28

- 1       **5. Publicity and marketing strategies for RainbowFest and DQSH, with WCLS handling**  
2       **explorer guides and in-branch promotional materials, while BOC handled social**  
3       **media marketing and potential radio advertising (subject to board approval).**

4  
5  
6  
7       **RELEVANCE TO CASE:**

8  
9       **1. Supports First and Fourteenth Amendment Claims**

- 10  
11       • Demonstrates WCLS actively collaborated with BOC in organizing and promoting  
12       DQSH events, showing state endorsement of private advocacy efforts.  
13       • Shows that government resources (WCLS) were used to facilitate BOC's initiatives  
14       while denying access to alternative viewpoints, reinforcing viewpoint discrimination  
15       under the First Amendment (*Rosenberger v. Rector*, 515 U.S. 819 (1995)).

16  
17       **2. Refutes BOC's Motion to Dismiss**

- 18  
19       • Strengthens the argument that BOC was a state actor under *Lugar v. Edmondson Oil*  
20       *Co.*, 457 U.S. 922 (1982) by showing its integration into WCLS operations.  
21       • Establishes joint action between WCLS and BOC in managing public events, security,  
22       and programming, contradicting BOC's claim that it operated independently.

23  
24       **3. Relevant to Monell Liability (Washoe County & WCLS)**

- Shows that **Washoe County officials and library staff** coordinated **preferential access** and **promotional efforts** for **BOC events**, making Washoe County **liable under Monell v. Dep't of Soc. Servs., 436 U.S. 658 (1978)**.
- Confirms **WCLS's direct involvement in volunteer coordination and event staffing** for BOC-affiliated events, reinforcing claims of **unconstitutional entanglement**.

## **CERTIFICATE OF AUTHENTICITY**

I, **Drew J. Ribar**, certify that the attached exhibit is a **true and correct copy** of **internal meeting notes** obtained as evidence relevant to this case. This document has been accurately reproduced and is submitted as part of the **record in compliance with the Federal Rules of Evidence (FRE 901, 902)**.

Dated: **March 17, 2025**

**/s/ Drew J. Ribar**

**Pro Se Plaintiff**

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Washoe Valley, NV 89704

(775) 223-7899

[Const2Audit@gmail.com](mailto:Const2Audit@gmail.com)

### **RainbowFest/DQSH Volunteer Meeting**

26 April 2023 @10 AM

Our Center Location

Present: WCLS: Pam Larsen, Tyna Sloan, & Lori Talarico

Our Center: Stacey Spain & Kelly Tanguay

Stacey has set up the following:

- Training for staff day, May 18<sup>th</sup>, with Holland Project and 2 Black Rock Rangers.
  - Training will focus on personal safety & public space de-escalation.
  - 2 separate sessions of 30 people each.
- Black Rock Rangers will participate in the NV RainbowFest for sure and possibly the SV one, if they are not already on the playa.
- With Burning Man having an in-town office, Stacey is hopeful for a continued good connection.
- Rainbow umbrellas are ordered for Our Center volunteers' chorus line.
- As soon as Chris has made a decision regarding the titles that they will present. We should let Stacey know so that our house can order the same titles to read outside during Chris' presentations.

Kelly met with her volunteers/Trans Support Group on Monday, and most were very interested. Her breakdown of volunteer needs for all of the events, is as follows:

- June 15<sup>th</sup>@ Downtown Reno (10-12 noon) (24 Total)
  - 24 – Umbrella Chorus Line
    - Tyna will split them (? 6-6-12 – Outside, Downstairs, Childrens)
- June 17<sup>th</sup> @ North Valleys & July 15<sup>th</sup> @ Sparks (10-2pm) (Similar) (~44 Total)
  - 5 – Setup & Décor
  - 24 – Umbrella Chorus Line
  - 2 – Black Rock Rangers
  - 1 or 2 – Oversight of Pop-Up Events
    - 1 or 2 – Oversight of Glow Up Booth
      - 4 or 5 – In-booth Volunteers
    - 1 or 2 – Oversight of Make Over Booth
      - 1 or 2 – In-booth Volunteers
    - 1 or 2 – Oversight of Drag King or Drag Queen Photo Op Booth
      - 1 or 2 – In-booth Volunteers with Polaroid Camera
    - 1 or 2 – Oversight of Growing Booth
      - 1 or 2 – In-booth Volunteers
    - 1 or 2 – Oversight of Brūka Theatre "Kinky Booth" Show Numbers
      - To be presented in between 11:30-12 noon
- Our Center will recruit volunteers in the following way:
  - 1<sup>st</sup> – Our Center Volunteers

EXH062

- 2<sup>nd</sup> – Pride Volunteers
- 3<sup>rd</sup> – Public Volunteer Solicitation

Publicity -

- WCLS –
  - Explorer & In-branch Information
- Our Center
  - Social Media
  - Possible Radio Spots
    - Stacey will take this to the board

EXH063